

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

In re

SCOTT BLUMSACK,

Debtor

)
)
)
)
)
)
)

Chapter 13
Case No. 21-40248-EDK

**STIPULATION BETWEEN DEBTOR AND CHAPTER 13 TRUSTEE REGARDING
TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN**

NOW COMES Denise M. Pappalardo, the Standing Chapter 13 trustee (the "Trustee") and the Debtors and hereby stipulate and agree as follows:

1. Upon the allowance of this Stipulation, the Trustee's objection to confirmation of the Plan shall be deemed sustained.
2. Within thirty (30) days of this agreement, the Debtor shall tender the sum of \$12,000.00 to be disbursed to unsecured creditors, excluding the student loan debt, upon confirmation of a Chapter 13 Plan.
3. Within thirty (30) days of the resolution of the United States Trustee's Motion to Dismiss Case and Objection to Confirmation of Debtor's Plan, the Debtor shall file an amended plan providing for student loan debt to be treated outside of the Plan and a 100% dividend to the remaining unsecured claims.
4. The Debtor shall not file any further amended plan that provides for less than a 100% dividend to the unsecured creditors.

Standing Chapter 13 Trustee

Dated: February 1, 2022

/s/ Joanne Psilos
Denise M. Pappalardo, Trustee
BBO # 553293
Joanne Psilos, Staff Attorney
BBO # 556997
P.O. Box 16607
Worcester, MA 01601
(508) 791-3300
denisepappalardo@ch13worc.com

SCOTT BLUMSACK
By Debtor(s) Attorney

Dated: February 1, 2022

/s/Dmitry Lev
Dmitry Lev, Esq.
134 Main Street
Watertown, MA 02472
BBO# 665236
(617)556-9990
dlev@levlaw.net